

Exhibit B

From: [Greenfield, Elliot](#)
To: [Laura King](#); "[ASHindi@willkie.com](#)"; [Cording, Charles Dean](#); [michael@mjllaw.com](#); [Schlegelmilch, Stephan J](#); [cbeal@dmablaw.com](#); [Born, Natascha](#); [Hahn, Ashley V.](#); [Tegrar, Steven](#); [jacabed@mjllaw.com](#); [O'Connor, Maeve](#); [Schaper, Michael](#); [sahuja@dmablaw.com](#); "[William Kraus](#)"
Cc: "[Matthew S. Weiler](#)"; [Oscar Shine](#); [Katie Buoymaster](#); "[Todd M. Schneider](#)"; [Xinchen Li](#); "[Mahzad K. Hite](#)"; "[Raymond S. Levine](#)"; "[Sunny S. Sarkis](#)"; "[Srujana Shivji](#)"; [Andrew Dunlap](#); [Bret Matera](#)
Subject: RE: In re Tether and Bitfinex Crypto Asset Litigation, 1:19-cv-09236 (S.D.N.Y.)
Date: Tuesday, November 7, 2023 1:01:53 PM

Laura,

As discussed yesterday, we don't agree to a stipulation covering all documents produced in the case. At the appropriate time, as necessary, we can revisit stipulating to a small subset. Please let us know if Plaintiffs agree to postpone RFAs until 30 or 60 days after a decision on the motion for leave to amend. We don't think it makes sense to proceed with those given the pending motion.

Thanks,
 Elliot

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From: Laura King [<mailto:lking@selendygay.com>]
Sent: Friday, November 03, 2023 13:45
To: Greenfield, Elliot; "[ASHindi@willkie.com](#)"; [Cording, Charles Dean](#); [michael@mjllaw.com](#); [Schlegelmilch, Stephan J](#); [cbeal@dmablaw.com](#); [Born, Natascha](#); [Hahn, Ashley V.](#); [Tegrar, Steven](#); [jacabed@mjllaw.com](#); [O'Connor, Maeve](#); [Schaper, Michael](#); [sahuja@dmablaw.com](#); "[William Kraus](#)"
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EXTERNAL

Counsel,

As you know, we are approaching the deadline for serving RFAs. We think it would not be a good use of the parties' time to use individual RFAs to confirm the authenticity of the many documents at issue in this case, when there does not appear to be any genuine dispute about their authenticity.

We again propose that the parties stipulate to the authenticity of documents produced in this litigation, to minimize unnecessary burden and promote efficiency. To be clear, the parties would reserve their rights to dispute admissibility on grounds other than lack of authenticity, including relevance.

Please let us know if you are amenable to signing the attached. We are available to meet and confer.

Best,
Laura

Laura King

Associate [[Email](#)]

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Pronouns: she, her, hers

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